

DECLARATION OF GERALD ARMSTRONG

I, GERALD ARMSTRONG, declare:

1. That I am the defendant and cross-complainant in the case of Church of Scientology of California v. Armstrong, et al., Case No. 420 153.

2. In 1979 I was at Gilman Hotsprings, California in L. Ron Hubbard's Household Unit (HU)--his personal staff which took care of his personal wishes and needs, e.g. food, laundry, cleaning, transportation, construction, maintenance, etc. The whole Gilman Hotsprings operation consisted of about 250 people and was called the Special Unit (SU). The SU contained the Commodore's Messenger Organization (CMO), who were Mr. Hubbard's representatives, a film production unit, a service organization which took care of meals, berthing, grounds maintenance, etc. and the HU. For most of 1979, I was the L. Ron Hubbard (LRH) Renovations In-Charge, responsible for renovations, decoration, and maintenance being done for Mr. Hubbard personally in his house and offices at Gilman Hotsprings. I was also in charge of the other Household Unit staff at Gilman Hotsprings, and was responsible to the Commanding Officer of the HU who lived at that time with Mr. Hubbard in a secret location in Hemet, California, about five miles from Gilman Hotsprings.

3. During 1979, Mr. Hubbard came to SU a number of times. Usually these visits were to meet with his wife, Mary Sue Hubbard, for discussions of family events such as birthdays, or to oversee photographic work being done at SU. On each occasion I readied his house for him, he came to the house and meals were prepared for him there. It was known by everyone at SU that the

1 house was Mr. Hubbard's and that no one else had use of the house
2 or offices.

3 4. While I was in charge of the HU at SU one of my
4 juniors was the LRH Gear In-Charge who was responsible for the
5 storage of Mr. Hubbard's personal belongings at SU. The storage
6 areas for Mr. Hubbard's personal belongings were at the time
7 the complete top floor of an old hotel on the property and four
8 large motel suites. Each room of these spaces was filled with
9 boxes of Mr. Hubbard's personal things.

10 5. In January 1980 there was an announcement at SU of
11 a possible raid to be made by the FBI or other law enforcement
12 agency, and everyone on the property was required by Mr. Hubbard's
13 representatives to go through all the papers on the property and
14 vet or destroy anything which showed that Mr. Hubbard controlled
15 Scientology organizations, retained financial control, or
16 was issuing orders to people at SU. I was required to destroy
17 anything which showed that Mr. Hubbard controlled Scientology
18 organizations, retained financial control, or was issuing orders
19 to people at SU. I was required to destroy evidence that the
20 house and offices at SU were intended for his use and that he had
21 ordered the renovations that had been done. A commercial paper
22 shredder was rented, brought to the property, and operated day
23 and night for two weeks to destroy hundreds of thousands of pages
24 of documents.

25 6. At one point during the shredding, my junior, the
26 LRH Gear In-Charge, came to me with a box of papers and asked me
27 if they should be shredded. I looked through them and found that
28 they were Mr. Hubbard's personal papers, diaries and other

1 writings from a time before he started Dianetics in 1950. I told
2 the LRH Gear In-Charge not to destroy any of these papers and I
3 took them from her to keep them safe. I also searched for and
4 located another twenty or more boxes containing similar materials
5 among Mr. Hubbard's personal effects in the hotel storage area.
6 I saved these from being shredded and made them safe.

7 7. On or about January 8, 1980 I wrote a petition to
8 Mr. Hubbard requesting to do the research for a biography to be
9 done on his life. (See Attachment 1) He approved the petition
10 and I became the LRH Personal Public Relations Officer Researcher
11 (PPRO Res). My immediate supervisor was then Laurel Sullivan,
12 LRH Personal Public Relations Officer who knew of my agreement
13 with Mr. Hubbard. (See Attachment 2)

14 8. A few days after my petition to Mr. Hubbard to do
15 the biography research was approved, Laurel was asked to assist
16 on a mission to work out a legal strategy which would protect
17 Mr. Hubbard from legal responsibility while he maintained control
18 of Scientology organizations through his personal representatives.
19 This mission, entitled "Mission Corporate Category Sort-Out"
20 (MCCS) lasted from January 1980 to July 1981. Laurel asked me
21 to assist her until other personnel could be arranged to do the
22 legal mission and I agreed.

23 9. In early February, because the MCCS mission would
24 have considerable dealings with Mr. Hubbard's attorneys in
25 Los Angeles, Laurel and I moved our office to the Cedars Complex.
26 I also moved to Los Angeles, over a period of one month, all the
27 LRH Archives materials I had located at SU, approximately six file
28 cabinets full.

1 10. Also in February 1980, because Mr. Hubbard had
2 been named as a defendant in various lawsuits, and because he
3 wanted to evade service of process in these lawsuits, he left the
4 location in Hemet and went into hiding, taking with him only two
5 aides, Pat Broeker and Annie Broeker. From this point on I was
6 told by several of Mr. Hubbard's personal representatives,
7 including Laurel Sullivan, his Personal Public Relations Officer,
8 that there was no line of communication to him. As a result I
9 was unable to report to him on the progress of the research, or
10 his archives which I had located and was assembling in one place.
11 It was for this reason as well, that my requests to purchase
12 what could be considered Mr. Hubbard's personal materials from
13 people who offered them for sale went to the CMO and not to
14 Mr. Hubbard directly. The CMO were and are Mr. Hubbard's
15 personal representatives, and not Scientology representatives,
16 and were acting for him. (See Attachment 3)

17 11. For the first two months in Los Angeles I spent
18 most of my time on the MCCS mission as Laurel's deputy.
19 Additionally I worked on the Purification Campaign, a program
20 which had the target of getting Mr. Hubbard a Nobel Prize for
21 his work in putting together the Purification Rundown.
22 Mr. Hubbard had ordered this Campaign Program and had written
23 Laurel a dispatch in late 1979 in which he had ordered that
24 unlimited funds be allocated for the purpose of getting him a
25 Nobel Prize. It was on the basis of this LRH order that I pur-
26 chased the Datsun car which I used throughout the biography and
27 archives projects.

28 12. In or about June of 1980 I became free of my MCCS

1 and Purification Campaign duties and was able to spend more time
2 on the Archives materials, which I had brought to Los Angeles
3 from SU. I went through these and put them in order as they had
4 been just randomly thrown in boxes when I had retrieved them from
5 the hotel storage space at SU. I also began copying some of the
6 materials and making up files for the original materials and
7 copies.

8 13. I also began taking actions to contact a writer
9 who could do the biography. There were some files on this subject
10 in the LRH Personal Public Relations Bureau from the period
11 before I was approved by Mr. Hubbard to do the biography research.
12 I went through these and studied reports and correspondence con-
13 cerning earlier attempts by other authors to do the LRH biography
14 and Mr. Hubbard's own comments about the biography and his own
15 life. I learned that Mr. Hubbard had approved of some biograph-
16 ical "workpoints" which had been written by Omar V. Garrison in
17 1977. (See Attachments 4 and 5) Omar Garrison had just completed
18 a book called PLAYING DIRTY which covered the FBI raids on
19 Scientology organizations in Los Angeles and Washington, D.C.,
20 the events which led up to these raids and the trials which
21 ensued. He had written two earlier books which dealt favorably
22 with Mr. Hubbard and Scientology, and so deemed by Laurel and
23 other of Mr. Hubbard's representatives to be the best choice to
24 author the biography.

25 14. In September of 1980 I met Mr. Garrison in England
26 and discussed with him the possibility of him writing the bio-
27 graphy and what documentation and assistance would be made avail-
28 able to him. I represented Mr. Hubbard in these discussions

1 according to the directions of Laurel Sullivan. Mr. Garrison was
2 told that the research materials he would have at his disposal
3 were Mr. Hubbard's personal archives and not Scientology
4 organization materials. Mr. Garrison was concerned and stressed
5 that he would only undertake the biography project if the
6 materials provided him were from Mr. Hubbard's personal archives
7 and if his contacts for the project were Mr. Hubbard's personal
8 representatives. The reason he gave for this was that he did
9 not trust the Scientology organization representatives to provide
10 him with factual materials. He had had some experiences while
11 doing other books concerning Scientology of being provided false
12 information by Scientology representatives and he was emphatic
13 that he did not want the same situation to repeat with the
14 Hubbard biography project. Mr. Garrison also stressed that he
15 would not write a panegyric or "puff" and would not have his
16 manuscript subject to the approval of anyone but Mr. Hubbard
17 himself.

18 15. In October of 1980 Mr. Garrison arrived in Los
19 Angeles and was toured through and shown by Laurel Sullivan the
20 LRH Archives materials that I had assembled up to that time.
21 Laurel stressed that these were Mr. Hubbard's personal archives
22 as this was an important "selling point" in getting Mr. Garrison's
23 agreement to writ the biography.

24 16. Laurel had already involved Mr. Hubbard's attorney,
25 Alan Wertheimer, of the firm of Rosenfeld, Meyer and Sussman,
26 in the biography project, and in fact I had been briefed by Mr.
27 Wertheimer in advance of my first meeting with Mr. Garrison on
28 what representations I should make to Mr. Garrison when we met

1 in England. In October of 1980, Mr. Wertheimer met with Mr.
2 Garrison, Laurel Sullivan and Mr. Lawrence Brennan, who repre-
3 sented himself as an officer of AOSH DK Publications, a Danish
4 publishing Company, and entered with them into biography contract
5 negotiations. A contract was written by Mr. Wertheimer and signed
6 by Mr. Garrison. (See Attachment 6)

7 17. I was present during the early part of the
8 biography negotiations and was present when Mr. Garrison was
9 told that the Archives were Mr. Hubbard's personally, that
10 Mr. Hubbard would be providing his personal representatives to
11 assist in the biography research and that Mr. Garrison would have
12 the opportunity to meet with and interview Mr. Hubbard. These
13 declarations were made to Mr. Garrison in order to get him to
14 agree to a lower than usual industry standard royalty percentage.
15 Mr. Garrison was told that because of these contributions by
16 Mr. Hubbard they would split royalties. At no time was a
17 Scientology representative present or involved in the biography
18 contract negotiations.

19 Following the finalization of the contract
20 between AOSH PDK and Mr. Garrison, Mr. Wertheimer, as Mr.
21 Hubbard's representative, entered into negotiations with AOSH
22 PDK to work out the financial arrangements between AOSH PDK and
23 Mr. Hubbard. Ms. Sullivan gave me copies of letters from
24 Mr. Wertheimer to AOSH PDK's representative, Wertheimer stated,
25 among other things:

26 November 17, 1980 ". . . Mr. Hubbard
27 is willing to make his personal files
28 available to PDK and Omar Garrison."

1 December 2, 1980 "Mr. Hubbard already
2 has ownership and possession of the
3 Archives. If he were inclined to do so,
4 Mr. Hubbard could, for relatively little
5 money, engage an author directly and then
6 own all rights to his own 'authorized
7 biography.'"

8 (See Attachments 7 and 8, respectively)

9 18. In the summer of 1980, Virgil Wilhite, a
10 Scientologist, but non-Sea Org member, who made a living as a
11 dealer in early Hubbard fiction writings and early rare Dianetics
12 and Scientology publications, spent some time working with me in
13 the LRH Archives. For the most part the work he did was research
14 and inventory of the hundreds of manuscripts and published works
15 in Mr. Hubbard's collection. At one point he was paid five
16 hundred dollars by Mr. Hubbard's personal accounts officer, not
17 a Scientology staff member, to inventory and appraise all the
18 writings in Mr. Hubbard's personal accounts officer to do the
19 same type of inventory and appraisal of another part of Mr.
20 Hubbard's personal archives which were not under my control, but
21 were under the control of another Sea Org member, Tom Vorn.
22 These archives were mostly Dianetics and Scientology technical
23 or policy original writings by Mr. Hubbard.

24 19. The disposition of the LRH archives was something
25 which the M CCS mission under Laurel Sullivan was planning to
26 handle as one of their actions for Mr. Hubbard. It was estimated
27 that the LRH Archives were worth, in a collector's market,
28 several mission dollars. The M CCS mission was looking for a way

1 for Mr. Hubbard to be paid that money by a private trust to be
2 set up which would be under the control of his personal repre-
3 sentatives. This was never finalized during the time I worked
4 with the archives, and I do not have first hand knowledge of the
5 details of what was planned for Mr. Hubbard's archives. I do
6 know these plans were being worked on by Mr. Hubbard's tax
7 attorney, James Murphy, of Rosenfeld, Meyer and Sussman, plus
8 Alan Wertheimer, in liaison with M CCS. At one point, as part
9 of this plan, I was asked by Laurel Sullivan to have Mr. Wilhite
10 redo the appraisal he had done, this time listing a minimum and
11 maximum value for each item. I was told by Laurel that this was
12 at the request of Mr. Murphy and was needed for tax reasons.

13 20. There was never any doubt that the archives I
14 brought from SU and the archives in Tom Vorm's care were the
15 property of L. Ron Hubbard, personally. There was never a
16 mention to the contrary during the whole time I was associated
17 with the archives and biography projects. Another major addition
18 to the Hubbard archives under my care was what were referred to
19 as the LRH Personal Secretary (LRH Pers Sec) files. LRH Pers
20 Sec, Pat Brice, was employed by Mr. Hubbard, and was not a
21 Scientology staff member. The files which she had maintained
22 in Clearwater, Florida, because they were Mr. Hubbard's personal
23 files, containing his personal writings and documents, were
24 added to the LRH Archives under my care in 1981. When I found
25 or purchased other materials which were not the personal property
26 of Mr. Hubbard, these were kept separate from the LRH personal
27 archives.

28 21. One of the actions M CCS was involved in to shield

1 Mr. Hubbard from the charge of inurement was to get those staff
2 members who served him personally and from whom he derived direct
3 financial gain to be paid directly by him. I was told by
4 Mr. Wertheimer and by Ms. Sullivan on several occasions that
5 because I was working for Mr. Hubbard personally as part of the
6 agreement with Mr. Hubbard and Mr. Garrison I should have been
7 paid by Mr. Hubbard. However, this was never worked out before
8 I left the archives area in 1981 because it could not be admitted
9 that there was a communication line to Mr. Hubbard on which this
10 could be arranged. Mr. Wertheimer stated in his letter to
11 Mr. Brennan of November 17, 1980:

12 ". . . while Mr. Hubbard may be willing
13 to waive an up-front payment or advance,
14 he must be reimbursed for his out-of-
15 pocket expenses in connection with the
16 compilation of the Archives, including,
17 without limitation, salaries paid to
18 employees hired by him in connection
19 with said compilations . . ."

20 (See Attachment 7)

21 I was the person doing the archives compilation for Mr. Hubbard,
22 and should have been paid by him.

23 22. For the first year or so of the biography and
24 archives projects, funding came from Mr. Hubbard's personal
25 staff unit at SU. In early 1981, however, Laurel Sullivan
26 ordered me to request that funding come from what is known as
27 Sea Org Reserves (SOR), now a part of the Church of Scientology
28 International. The reason for this, as given to me by Laurel

1 and what I stated as the reason to the SOR Chief, was that
2 Scientology organizations would be making millions of dollars
3 from the sale of the biography to their parishioners, so ought
4 to contribute to the project monetarily. Approval for this
5 change to funding by SOR came from the SOR Chief and Watch Dog
6 Committee (WDC) the top CMO unit who were Mr. Hubbard's
7 personal representatives. I used two photocopiers during my
8 time on the biography and archives projects; the first was
9 purchased with funds approved by Mr. Hubbard, the second was
10 purchased by funds from SOR approved by WDC.

11 23. From November of 1980 into 1981, I worked very
12 closely with Mr. Garrison, assembling Mr. Hubbard's archives
13 into logical categories, copying them and arranging the copies
14 of the archives materials into bound volumes. I made two
15 copies of almost everything I copied for Mr. Garrison; one for
16 him, the other to remain in archives for easy reference or re-
17 copying so that originals would not have to be handled again.
18 I made up for Mr. Garrison approximately 400 of these binders of
19 letters, documents, etc. The vast majority of what I copied
20 for Mr. Garrison came from Mr. Hubbard's personal archives.
21 Occasionally Mr. Garrison asked me to obtain some information
22 which a Scientology organization possessed and which did not
23 come from Mr. Hubbard's archives; e.g., sentencing reports
24 for the Scientology executives convicted in Federal Court;
25 Guardian Office Intelligence Bureau reports on Mr. Hubbard's
26 son, L. Ron Hubbard, Jr., etc. These I proved Mr. Garrison with
27 the permission of the Scientology staff members who had them in
28 their charge.

1 24. In the fall of 1981 I also provided Mr. Garrison
2 with a quantity of original materials from Mr. Hubbard's
3 archives. The reason for this was so Mr. Garrison could go
4 through these originals, decide what letters or documents he
5 would refer to, quote from or otherwise use in the biography.
6 In this manner it would not be necessary to copy huge quantities
7 of materials, perhaps of no use in the biography. There was a
8 need to do this because the due date for Mr. Garrison's production
9 of the completed manuscript, May 1, 1982, did not allow enough
10 time to copy all the available materials from Mr. Hubbard's
11 archives. The provision of originals was done to facilitate
12 Mr. Garrison's work and was entirely within the agreements of the
13 biography contract.

14 25. From mid 1980 to December 1981 when I left the
15 Sea Organization, I worked continually on researching and
16 assembling materials concerning the life of L. Ron Hubbard. I
17 interviewed dozens of individuals who had known Mr. Hubbard
18 personally, including his living aunt, living uncle, and four
19 cousins. I did a genealogy study of his family. I collected,
20 assembled and read hundreds of thousands of pages of documentation
21 in his archives.

22 26. During 1980 I remained absolutely convinced of
23 Mr. Hubbard's honesty and integrity and I believed the repre-
24 sentations he had made about himself in various publications. I
25 was then devoted to the man and was convinced that, as he claimed,
26 anything which I came across which was unflattering of him or
27 contradictory to what he had said about himself, was a lie being
28 spread by his enemies. Even when I found documents in his

1 personal archives which indicated that what he had said was untrue
2 on some point my mind would make up ways to make the contradictory
3 documentation fit what he had said. In short, I was brain-washed.

4 27. Slowly, I came to see that Mr. Hubbard had lied
5 continually about his past, his credentials and his accomplish-
6 ments. I began to see significant personality flaws in him,
7 notably his cowardice, his susceptibility to flattery and his
8 dishonesty. I saw that Mr. Hubbard looked like the charlatan
9 his detractors had tried to portray him as, and I came to believe
10 that the only way Scientology could succeed in its goal of
11 creating an ethical environment on earth, and the only way Mr.
12 Hubbard could be free of his problems, would be for him and
13 Scientology to cease to lie about his past, credentials and
14 accomplishments. I resisted any public relations piece or an-
15 nouncement about Mr. Hubbard which the LPH Public Relations
16 Bureau proposed for publication which was not factual, which
17 contained unverifiable claims or was obvious "puffery." I at-
18 tempted to have changed and made accurate the various "about the
19 author" sections in Scientology books, and I rewrote or critiqued
20 several of these or other publications for the LPH Public
21 Relations Bureau or various Scientology organizations. I also
22 attempted to get false claims made by Scientology removed, and to
23 get the truth, and not hyperbole into their publications (e.g.,
24 the claim that there are seven million Scientologists. The
25 truth is there are in the neighborhood of a hundred thousand.)
26 I also protested the Sea Organization and the Guardians Office,
27 had degenerated into an intelligence operation masquerading as
28 a religion, and that its practices created an atmosphere of

1 of mistrust which would eventually destroy it. I felt then that
2 I had uncovered some of the truth which had been buried by Mr.
3 Hubbard, and I wanted my organization and its leader to become
4 decent and truthful.

5 28. In late 1981 I began to see that I had been
6 deceived from the start and I saw that others within the organ-
7 ization were also duped. I began to observe that crimes were
8 committed and human decencies and individual rights ignored
9 and suppressed in order to protect the myth and lies of L. Ron
10 Hubbard. I also saw that Scientologists who committed the crimes
11 or violated individual rights did so because they were deceived.
12 I saw the whole organization caught up in this, thousands of
13 people, who would lie and cheat in the name of "truth." In
14 October of 1981 I found that my wife, Joyce, was being ordered
15 to commit illegal acts on a "legal" mission she was doing for a
16 Scientology branch called Scientology Mission International (SMI).
17 I requested the head of the CMO to have her come off this mission
18 and to work in my area. (See Attachment 9) Before I heard
19 back from the head of CMO, I moved Joyce down to work with me
20 as she was becoming very distraught with continuing on with what
21 she knew to be illegal.

22 29. In late November of 1981, I was requested to come
23 to SU by a CMO executive, Cirrus Slevin, where I was confronted
24 with a report written by Norman Starkey who was on the legal
25 project which had replaced MCCS to handle Mr. Hubbard's legal
26 problems. Norman had requested that I be "sec-checked," which
27 means subjected to a lie detector interrogation. Norman wanted
28 to determine what materials I had given Omar Garrison and

1 requested that I not be shown his report or told who had authored
2 it. I was struck by his report because it pointed out to me that
3 I was not going to be able to make the organization honest and that
4 the intelligence mentality with its secret reports and secret
5 sources still ruled the organization. My communication to the
6 Ms. Slevin, after meeting with her, gives an idea of my viewpoint
7 and attitude at the time. (See Attachment 10)

8 30. About ten days after I wrote the dispatch to
9 Ms. Slevin I finally decided to leave the Sea Organization.
10 I stayed another week to tie up loose ends as well as I could,
11 moved my wife's and my belongings a bit at a time out of the
12 Cedars Complex building into a storage space I had arranged, and
13 cleaned up our room. We did not tell anyone we were leaving as
14 it is the practice in the Sea Organization, especially with
15 executives in positions like mine, to detain and even lock up
16 anyone who wishes to leave. I did not want myself or my wife to
17 go through that form of degradation as we did not then believe
18 in the rightness of this sort of practice or policy.

19 31. I had been authorized by Mr. Hubbard to do his
20 biography research and had been given a written letter of in-
21 troduction from Mr. Hubbard by his personal secretary, Ms. Pat
22 Brice (see Attachment 2) in which she stated: "Mr. Hubbard has
23 given his permission for Gerry to do any research needed to
24 assist the authority of the biography . . ." It had become ap-
25 parent to me that within the Sea Organization I would not be
26 permitted to complete the biography project. I had a con-
27 tractual agreement with Mr. Hubbard and another with Mr. Garrison.
28 The organization, pretending to act for Mr. Hubbard, was seeking

1 to take over control of the biography project in which they had
2 no standing. Organization officers were claiming there was no
3 line to Mr. Hubbard, so the biography could never be "authorized."
4 It was always my intention to complete the biography project and
5 my contractual agreement with Mr. Hubbard, however, it was the
6 Sea Organization and its own policies, which wished to prevent
7 my doing so.

8 32. In order to continue my commitment to Mr.
9 Garrison, and the biography project, I copied a large quantity
10 of materials prior to leaving the Sea Organization, that
11 Mr. Garrison had requested or would be useful to him for the
12 biography. I delivered all of this material to Mr. Garrison
13 the day I left the Sea Organization and kept nothing in my
14 possession. I also maintained friendly relations with
15 Mr. Hubbard's representatives involved with the biography
16 project during this time. At the request of Vaughn Young I went
17 into the archives office in the Cedars Complex, showed him the
18 various categories of materials and answered his questions con-
19 cerning them. I also met with Barbara De Celle at her request
20 and answered questions she had on where things were located or
21 the status of various projects or actions. In late February
22 Mr. Garrison mentioned to me that Mr. Young reported not being
23 able to find a certain group of materials so I wrote to Mr.
24 Young to explain where the materials were and what comprised
25 them. (See Attachment 11) Another time, at Mr. Garrison's
26 request I went in to the archives office and located some
27 materials he wanted which Mr. Hubbard's representatives were
28 then claiming they could not locate.

1 33. Two days before my wife and I left we received
2 copies of a "Staff Contract for Employment by the Church of
3 Scientology International." (See Attachment 12) I realized
4 that I could not agree to the stated conditions because I had
5 uncovered information which disproved the statement made
6 about L. Ron Hubbard and Mary Sue Hubbard and which led me to
7 the conviction that the need for such a contract was based on
8 a number of misrepresentations and fraudulent practices by
9 Mr. Hubbard and the organizations.

10 34. Although I was very disappointed with Scientology
11 and Mr. Hubbard, and felt betrayed and deceived by them when I
12 left I had no enemies. I felt no ill will toward anyone in the
13 organization nor Mr. Hubbard, but believed that a truthful
14 biography should be written.

15 Omar Garrison offered his support and help when
16 my wife and I first left the Sea Organization. He recognized
17 that I had gone through a very lengthy and traumatic mental
18 programming and deprogramming process, and that I would have
19 difficulties fitting back into normal life, having been quite
20 cut off from the real world for almost eleven years in the
21 Sea Organization. Right after my wife and I left Mr. Garrison
22 loaned us his truck to drive to Canada where we spent Christmas
23 with my parents.

24 35. In February of 1982, I began to assist Mr.
25 Garrison with the L. Ron Hubbard biography project with his
26 consent and at his request. He required my assistance in that
27 the individual tending the archives was not being helpful, was
28 not providing the materials Mr. Garrison needed and requested,

1 and was not being honest with him. At Mr. Garrison's request,
2 I transcribed some of his interview tapes, copied some of the
3 documentation he had, and assembled several more binders of
4 copied materials. I also set up shelves for Mr. Garrison for
5 all the biography research materials in both of his homes and
6 worked on a cross-reference system for the materials. I also
7 continued to do library research for the biography and arranged
8 interviews for Mr. Garrison.

9 36. From the time I first left the Sea Organization,
10 the Intelligence Bureau of Scientology's Guardians Office had
11 begun carrying out an intelligence operation against me. My
12 parents were immediately contacted, despite my request that
13 they not be, and were upset by the caller. Friends were con-
14 tacted and asked for intelligence information on myself and my
15 family. Some other friends, Jim and Nancy Dincalci, told me that
16 a Scientology representative stated I was spreading a rumor that
17 Mr. Hubbard was a homosexual. I never said any such thing and I
18 was not spreading rumors about Mr. Hubbard. I knew from
19 experience with Scientology intelligence and harassment tactics
20 that there was a campaign being carried out against me. I met
21 with Mr. Hubbard's representatives and requested that this cease
22 and I was assured by them, Mr. Young and Terri Gamboa, that if
23 there was such a campaign it would be terminated.

24 37. Before I left the Sea Organization, Laurel
25 Sullivan who had been Mr. Hubbard's personal representative for
26 eight years, had told me about some of the criminal activities
27 Scientology, and especially the Guardians Office, had been
28 involved in. She mentioned an assassination plot originated by

1 the Guardian's office (GO) against a disaffected Scientologist
2 in Canada, Lorna Levett. She also mentioned GO tactics like
3 putting LSD in toothpaste of someone who was speaking out
4 against Scientology. I also knew from documentation that I had
5 read about other acts against individuals, such as Paulette Cooper
6 whome the organization had framed with a phony bomb threat against
7 government officials.

8 I knew also that the ruthless attack of anyone
9 viewed as disaffected or a critic of Mr. Hubbard or Scientology
10 was based on Mr. Hubbard's own practices and policies. The
11 GO, with its covert intelligence operations, was created by him.
12 I also knew that his policies were often taken literally by
13 individuals within the organization and were made available so
14 that they could be taken literally. One of the most referred to
15 and revered policies in Scientology and the Sea Organization,
16 HCO Policy Letter of 12 February 1967 "The Responsibilities of
17 Leaders," contains several of these sorts of statements:

18 "When you move off a point of power,
19 pay all your obligations on the nail,
20 empower your friends completely and
21 move off with your pockets full of ar-
22 tillery, potential blackmail on every
23 erstwhile rival, unlimited funds in your
24 private account and the addresses of
25 experienced assassins and go live in
26 Bulgravia and bribe the policy.

27 * * *

28 "He (a person in a position of power)

1 doesn't have to know all the bad news
2 and if he's a power really he won't
3 ask all the time, 'What are all those
4 dead bodies doing at the door?' And if
5 you are clever, you never let it be
6 thought HE killed them - that weakens
7 you and also hurts the power source."

8 (See Attachment 13)

9 38. In April of 1982 in order to finance a book I
10 was planning on World Hunger, I contacted Virgil Wilhite to see
11 if I could sell some photos I owned which had been taken at my
12 first marriage on board the Sea Organization ship "Apollo" in
13 1974. Several of these were photographs of Mr. Hubbard. There
14 is a considerable collector's market for photos of Mr. Hubbard
15 and these were unique and not available through normal
16 Scientology channels. Mr. Wilhite agreed to sell the album
17 of photos for me. (For a description of these photos, see
18 Attachment 14) I also mentioned to Mr. Wilhite that two of
19 my friends, Jim Dincalci and Kima Douglas, also had photographs
20 of Mr. Hubbard that they owned from when they were in the
21 Sea Organization and which they wanted to sell. Mr. Wilhite
22 agreed to sell all three collections and we settled on a price of
23 \$2,000.00 to each of us for our respective collections. Mr.
24 Wilhite was to receive for himself whatever over \$6,000.00 he
25 sold the photographs for.

26 On April 22, 1982, Mr. Wilhite called my home
27 and left the following message on my phone answering machine:

28 "Give me a call right away. I need

1 them right now. Hey Gerry, hurry up
2 and call me. This is hot. You needed
3 some bucks, we got them. Give me those
4 pictures quick. It's all on approval.
5 We got to get this stuff over to these
6 guys. It's in CW. So get in touch
7 with me right away. They're sold. Bye."

8 (CW above refers to Clearwater, Florida.)

9 39. Over the next two days I travelled to Palm Desert
10 to the home of Kima Douglas, and to Palos Verdes to the home of
11 Jim Dincalci. I obtained from each of them their collections of
12 photographs, got each of them to write up or dictate to me a de-
13 scription of each photo which was typed into a statement and
14 signed. I bought a photo album and arranged the photos in a very
15 presentable format. I did not request a commission for my efforts
16 but offered to do this out of friendship. On April 25, 1982, I
17 delivered the photos to Mr. Wilhite at his home in Los Angeles.
18 He said he would send them off right away to Clearwater and he
19 would receive payment for them in a few days.

20 40. The same day, April 25, my wife and I met with
21 one of her friends from the Sea Organization, Marilyn Brewer.
22 Ms. Brewer mentioned that a Suppressive Person Declare had been
23 put out by the organization on me. A couple of days later she
24 gave me a copy of the Declare. (See Attachment 15) I was upset
25 by the Declare as it seemed to me that my eleven years of service
26 to the Sea Organization and Mr. Hubbard were totally ignored.
27 Also, I believe that Declare itself was put out only for covert
28 intelligence reasons: To create an environment within the

1 organization which then made it acceptable for the organization
2 power structure to carry out a campaign of harassment against
3 me.

4 41. On May 3, as I had not heard back from Mr.
5 Wilhite, I called him to find out if he had received payment for
6 the photographs. He told me that he had been contacted by
7 Scientology representatives, had been shown the Declare on me,
8 and had then turned the photos over to a Lyman Spurlock,
9 whom Virgil said identified himself as a Scientology attorney.
10 When I was involved with the archives project, Lyman Spurlock
11 was the investments officer for Scientology reserves.

12 I told Mr. Wilhite that I would come to his home
13 that night to collect the photos from him. That night I went to
14 Mr. Wilhite's home and he gave me back my own photo album but
15 said that the organization people he had talked to refused to give
16 back the other photos and they were with Scientology attorneys.
17 Present during my conversation with Mr. Wilhite were Mr. and
18 Mrs. Garrison and my wife, Joyce.

19 42. I then went to the CMO building at the Cedars
20 Complex of Scientology in Los Angeles and spoke with some CMO
21 members who knew about the photos. Two of these people were
22 John Alesso and Steve Marlowe. These CMO members admitted that
23 the photos were with Scientology attorneys but they refused to
24 give them back. They claimed that they did not want them in the
25 hands of a collector because some of them were unfavorable to
26 Mr. Hubbard, that is, they were not flattering photographs. I
27 told them that their actions were simply an evidence of the
28 Fair Game Doctrine of Scientology wherein anyone named a

1 "Suppressive Person" has no right to property. At the end of
2 my attempt to have the organization give back the photographs,
3 Terri Gamboa, my former wife and the head of the mission taking
4 care of Mr. Hubbard's legal problems, arrived on the scene,
5 demanded that I leave the premises and told me to get an attorney,
6 implying by that statement that Scientology had a legal action
7 pending against me. Present during this interchange in the CMO
8 building were Mr. and Mrs. Garrison and my wife.

9 43. A few days after this accident, Jim Dincalci, one
10 of the persons whose photographs had been taken, suggested that
11 I contact Michael Flynn, an attorney from Boston who had been
12 involved with various court cases concerning Scientology and who
13 understood how the organization operated. I decided against
14 contacting another attorney who might not understand Scientology
15 as the length of time and costs to brief and unbriefed attorney
16 on the organization and my years of involvement and the current
17 situation would be prohibitive.

18 44. I called Mr. Flynn and on May 6, 1982, he
19 arranged to meet with me in Clearwater Beach, Florida. I met him
20 and briefed him on my situation and the fact that I was by this
21 time afraid that my life and my wife's life were in danger. I
22 brought a few documents with me to show Mr. Flynn and to seek his
23 advice. I did not leave any materials with Mr. Flynn. I had
24 come to believe by this time that the organization was afraid of
25 the contents of the archives materials I had provided Mr. Garrison
26 and would go to almost any length to get them from Mr. Garrison
27 or destroy them. Mr. Garrison knew I was going to see Mr. Flynn.
28 He had a few weeks earlier told me that Lyman Spurlock had

1 (during a meeting to discuss contract revisions Mr. Garrison had
2 requested) accused Mr. Garrison of blackmail for requesting the
3 revisions. Also Mr. Garrison had become very concerned that the
4 organization might try to steal the archives materials. He knew
5 from his study of the organization over a ten year period that
6 they had done just that many times before, even from Federal
7 government agencies. Mr. Garrison felt the Scientology organ-
8 ization was acting alone, without Mr. Hubbard's knowledge and
9 without a legitimate claim on the materials.

10 45. On May 29, 1982, my wife and I assisted the
11 Garrisons in moving from their Costa Mesa residence in Utah. I
12 transported some of Mr. Garrison's biography research materials
13 in my car, including some of his biography interview tapes which
14 I listened to on the way to Utah to keep myself awake. Included
15 among his tapes were four which I had given to Mr. Garrison as
16 blanks for his use in doing interviews. These were labeled for
17 the MCCS mission from meetings held in September 1980. I hap-
18 to put one of these in the cassette player and listened to it, and
19 found that it contained evidence of serious fraud committed by
20 the organization. It also contained an understanding of how the
21 Religious Research Fund (RRF) operates, and provided some insight
22 into Mr. Hubbard's methods of operating. I offered to transcribe
23 this tape and the others for Mr. Garrison.

24 46. Contrary to the declaration of Barbara De Celle,
25 I did not take these tapes from her desk drawer. The manner in
26 which I came into possession of the tapes was as follows:

27 47. In September of 1980, Barbara De Celle came to me
28 and asked to borrow some blank cassettes from the biography

1 archives project in order to record some M CCS mission conferences.
2 I obliged her and loaned her the cassettes.

3 48. The M CCS conferences were conducted and recordings
4 were made of them. Barbara, whose office at that time was near
5 mine and with whom I often communicated, mentioned to me at the
6 time that she was transcribing the recordings.

7 49. After Barbara transcribed the conference recordings,
8 the cassettes sat on top of her desk, not in a drawer of her
9 desk as she states, for almost a year. There were four cassettes
10 and I noticed them many times in that location.

11 50. In September of 1981, Barbara brought the four
12 cassettes to me and said that they were no longer needed and that
13 I could have them back. It was generally known and had been
14 discussed by Barbara and I that the M CCS mission was considered
15 by the CMO and Mr. Hubbard as a failure and the head of the
16 mission, Laurel Sullivan, had been removed from her LRH Personal
17 PRO post, subjected to hard labor at Mr. Hubbard's base at
18 Gilman Hotsprings and kept under guard on that property. For
19 this reason, implied by Barbara, there would be no further need
20 or use for the cassettes. The cassettes were presumably not
21 packed up and shipped off with the rest of the M CCS materials,
22 which Ms. De Celle mentions, because the cassettes were biography
23 project property.

24 51. A short time after this I gave these four cassettes
25 to Mr. Garrison to be used for recording interviews in connection
26 with the biography project. This was according to contractual
27 agreements with Mr. Garrison.

28 Many months later, on May 29, 1982, while assist-

1 ing Mr. and Mrs. Garrison to transport their belongings to their
2 home in Utah, I happened to be carrying in my car some of Mr.
3 Garrison's biography materials including various cassettes of
4 interviews. I listened to some of these in order to keep myself
5 awake and it was at this time that I first heard two of the M^{CCS}
6 conference tapes, which Mr. Garrison had not recorded over.

7 52. When my wife and I returned from Utah on May 31,
8 1982, I found a letter from an attorney, John G. Peterson, in
9 my postal box. This letter, dated 27 May 1982 did not identify
10 who he was retained by, claimed that I had materials I had taken
11 while in the employ of his client (who was not named) and
12 threatened legal action. (See Attachment 16) I answered this
13 letter June 9, 1982. (See Attachment 17) In the meantime, I
14 was served by a process server outside the post office where I
15 had my mail box. This meant to me that the organization was
16 employing private detectives exactly according to Mr. Hubbard's
17 policies and my life really was at risk.

18 53. Also on May 31, 1982, I received a telephone call
19 from Marilyn Brewer, who said that there was another Suppressive
20 Person Declare on me, this time linking me with drugs and claim-
21 ing I had stolen documents from the organization and was
22 selling them. I asked Ms. Brewer to send me a copy which she
23 did. (See Attachment 18) This Declare contained a number of
24 false accusations including an attempt to link me with LSD
25 proponent Timothy Leary, that I had taken and sought to sell
26 Church property, that I had falsified financial records, that
27 I had covered the expenses of non-Church companies, that I was
28 promulgating false information, and that I had altered documents.

1 This Declare was dated April 22, 1982, the day Virgil Wilhite
2 had called me to arrange the sale of the photos. In my mind it
3 was very possible that someone in the organization assumed that
4 I was selling organization photos but came with signed statements
5 of possession by Jim Dincalci and Kima Douglas, the organization
6 had to retain or destroy the evidence of the false accusation in
7 the Declare. It is also very possible that the organization has
8 fabricated or created other "evidence" to substantiate these
9 accusations now that they have widely distributed the Declare.
10 Statements about drug connections are simply to discredit me or
11 to set me up for planting drugs on me at some time. With
12 another person, Tonja Burden, the organization tried to discredit
13 her as a litigant by claiming she was a drug user.

14 54. Some time after this in June I again met with
15 Mr. Flynn in Los Angeles at which time I gave him a number of
16 documents from Mr. Garrison's biography research materials for
17 advice as to their disposition.

18 55. Along with my wife I also did a taped interview
19 for the ABC television show 20/20 in which I spoke out against
20 the practices of Fair Game, what Scientology had done to me
21 since I had left the Sea Organization and the misrepresentations
22 that Mr. Hubbard had made which had enticed me into Scientology
23 and joining the Sea Organization. The taped interview involved
24 no documents from the biography project. I also wrote three
25 affidavits for court cases in progress against Scientology, making
26 known what fraud, misrepresentation and illegal activities I knew
27 the organization and Mr. Hubbard to be involved in. I did these
28 things because I fear for my life and my wife's life and I feel

1 that I have to assume as high a profile as possible to insure our
2 safety, and because I felt morally obligated to try to correct the
3 unethical practices of the organization to which I had been
4 connected for so many years, and felt that to withhold this in-
5 formation would be an obstruction of justice.

6 The Church of Scientology of California, which has
7 no standing whatsoever regarding Mr. Hubbard's archives and the
8 biography, has now sued me. Their attorney, Carl Kohlweck,
9 threatened me with criminal action during my deposition and his
10 representations to the court contain many half truths given to
11 him by the organization.

12 56. The declaration of Andrew M. Lenarcic states that
13 more than 80 percent of the documents and artifacts in the
14 archives which were under my care were owned by the Church of
15 Scientology. This is untrue. In fact, more than 80 percent of
16 these same archives were known to me to be the personal property
17 of L. Ron Hubbard. The remaining 20 percent were kept separate
18 and were not considered a part of the "archives."

19 57. The "Church" had no knowledge of the "project to
20 put together biographical material dealing with L. Ron Hubbard"
21 (see Lenarcic declaration, paragraph 5) before I originated the
22 project with my petition directed to L. Ron Hubbard in January of
23 1980. This was not a "Church" project. So to say that this
24 project was "the reason the Church obtained custody of many
25 of the personal files and documents of L. Ron Hubbard which exist
26 in the archives today" is false (see Lenarcic declaration, para-
27 graph 5).

28 58. The statement that the responsibility of the

1 Church is to preserve the archives materials because they are
2 valuable in monetary terms and precious because they represent
3 the work and history of Mr. Hubbard as founder of Scientology and
4 Dianetics is belied by the fact that the Church has destroyed
5 literally hundreds of thousands of pages of documents, many of
6 which were original writings of Mr. Hubbard, simply because the
7 organization felt these documents contained incriminating
8 information.

9 59. In actual fact, I saved a great deal of Mr.
10 Hubbard's archives materials from being shredded in 1980 when
11 there was a massive mobilization of personnel at Gilman Hotsprings
12 to do so.

13 60. Furthermore, at no time while I was assembling the
14 archives materials did Andrew Lenarcic ever enter the Archives
15 space, and there is no way, short of my or Mr. Hubbard's
16 personal identification for him of the various parts of "archives"
17 that Mr. Lenarcic could truthfully make the statement he did.

18 61. Since at least August 18, 1982, I have been
19 followed and surveilled by individuals who have stated that they
20 are employed by the plaintiff in a case against me, i.e., the
21 Church of Scientology of California. My wife and I have been
22 continually harassed. On August 29, 1982, I was physically
23 assaulted (pushed around) by one of the individuals paid to
24 follow and harass us. On August 31, 1982, I was struck in the
25 elbow by a car drive by one of the individuals paid to follow
26 and harass us. On September 2, 1982, one of the individuals paid
27 to follow and harass my wife and I attempted to involve me in a
28 traffic accident. On several occasions these same individuals

1 have come onto the private property at the trailer park where I
2 live, despite orders by the park manager that they were not to
3 do so in order to spy on my wife and I. These same people created
4 disturbances where I live and have upset my neighbors. They have
5 on three occasions come right up beside me when I had been making
6 a payphone call and listened when I was speaking. Thus, I have
7 had no privacy in my communications.

8 On September 6, 1982, two of the individuals
9 paid to follow and harass my wife and I, parked on private
10 property only six feet from our trailer and watched our home the
11 entire day. A neighbor reported that one of the individuals
12 got up on something to peer into our windows. These people are
13 embarrassing, they are harassment paid for by the Church of
14 Scientology and they evidence the Fair Game Doctrine of
15 Scientology. They also needlessly put innocent people at risk,
16 including my wife and I, because in carrying out their following
17 and harassment tactics, they violate the law. One of them in
18 attempting to follow me on September 11, 1982, was pulled over
19 for an illegal U-turn by an officer Baeckel of the Costa Mesa
20 police. Officer Baeckel later told me that the man had
21 claimed that he was following us because I had stolen some
22 documents. This statement is false and simply a form of harass-
23 ment and libel. I am more than ever convinced that my life and
24 my wife's life are in danger at the hands of Scientology.

25

26

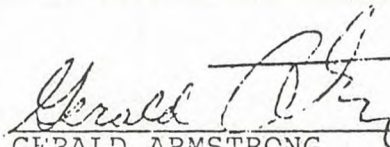
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I declare under penalty of perjury that the foregoing
is true and correct.

Executed this 16th day of September, 1982, at Woodland
Hills, California.


GERALD ARMSTRONG

R

8 Jan 1980

M on D

Gerry Armstrong

cc: CO HU
DCC HU
cc: DCO CMO SU
cc: Snr P PRO
cc: HAS Pers Office

PETITION

Dear Sir,

I am petitioning you to be posted to handle research for your biography and related projects.

I feel it warrants a petition to you because it entails research on your personal time track and the person doing such would have to have your trust.

I wish to do this for the following reasons:

1. The future of this planet depends on Scientology. The success of Scientology at this time will depend in no small measure on the success of various of R's personal undertakings; the Purification R/D and Nobel Prize pjt, the R Biography and press/legal handlings to mention the few I know about.

These projects currently have no one researching, data gathering and collating for them.

2: The finalization of any one of these projects will greatly alleviate current threats to R. His free movement could become possible and his actions, projects and ideas in other spheres will become more accepted.

3: R val docs and writings will be preserved - this will be a great part of the post.

Currently this is not being done adequately. Just 3 days ago I came across a box of very old papers in Del Sol which were unknown to the PPROS and others here. These included R writings from the 30's and 40's, R grade school English class essays and poems, an R diary from the trip to Asia and many other docs.

These writings are of immeasurable value to an R Biography, future museum and to the billions of Scientologists this planet will see.

Also in Del Sol I found some docs from R's Navy period which will now be used in press legal actions. Document research is a must for success in this legal battle.

I'm sure there are many more such val docs, writings and data around the planet to be found, preserved and used to enhance R's image and viability.

The papers I have just found have been copied as an insurance against their loss and the originals have been put into zip-lock bags and wrapped in plastic.

4. A documented, published biography could become the basis for an R Life film (major production). This will likely be the ultimate step toward universal acceptance of R and his products. Any personnel added to handle these areas at this time will greatly shorten the time to such a production.

5. I believe I have the qualifications to do this job:

I have 9 years of SO track during which I worked with R on the ship, at UCE and WHQ.

I have a decent this lifetime training in PR, legal and Intel, areas in which I worked on the ship between 1971 and 1975. I would not do anything stupid on any line which would damage R or Scientology.

I'm literate. My written English is grammatically adequate. I have little background in creative writing, however this would not be necessary because the biography would be handled by a proven author such as Garrison.

I have had fabulous personal gains and successes from LRH Tech.

6. I do not feel my current post of R Renos I/C and the present functions I'm performing are as vital at this time as those I'm requesting to do. My post is in a condition where it can easily be turned over. There are no immediate demands for R living or office spaces at S.

I have worked in R Renos for a year and have been the I/C for the last 6 months. It has been a relatively flapless period and there have been a number of accomplishments.

I am considerably more trained and gifted in the area of research than I am in building construction.

I know my seniors, the CO HU and D/CO HU, with whom I've worked very well all this time, would not object to my leaving the area to do this function which is so important to R's success.

7. This is something I want very much to do. (It is the first post in the SO I've ever asked for).

I first recognized its need back in 1973 on the ship when I did a project for Mary Sue of time-tracking the Apollo's movements from purchase to that date. I had a hell of a time. Nobody was recording a Ship's History and the CK logs and Nav logs were lost or in terrible shape.

Recent events and the discovery of the old R writings have made the collecting up of R's docs and writings and the Scientology and Sea Org Histories and their preservation and their use in the production of a biography and other projects a vital, vital task.

This is the way I can best serve you.

I'm requesting your approval on creating this post. Likely it would be in the Pers FRO area and be entitled something like "Biography Researcher".

Duties would include:

- collecting up all R val docs from around the world (except those actually needed in a specific location)
- seeing to their proper preservation including vault safe against fire and sabotage
- collecting up all R manuscripts and R writings of any kind possible
- surveying for and gathering up personal contact accounts for legal, PR and biographical/anecdotal use
- interviewing people for the same
- sifting through R lectures and writings for usable incidents and contacts
- liaison with the Biographer for documentation and data
- line to R for verification of data and approvals
- false report correction actions

I'm sure there are more and even these are a large undertaking.

Sir, may I have your permission to do the above?

This is okay.

Much love,

Gerry

R CK _____

R Not CK _____